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October 10, 2024

Via ECF

The Honorable Kenneth M. Karas
United States District Court for the Southern District of New York
Charles L. Brieant Jr. Federal Building and United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601

Re: Newman v. Bayer Corporation, No. 7:22-cv-7087-KMK-AEK
Plaintiff's Motion To Seal Documents

Dear Judge Karas,

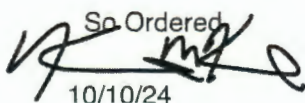
I represent Plaintiff Tanysha Newman ("Plaintiff") in the above matter. I write pursuant to Rule IX.A of Your Honor's Individual Rules to request an Order permitting Plaintiff to file under seal the portions of Plaintiff's Reply In Support of Class Certification that relies on or mentions documents that have been previously filed under seal. *See* ECF Nos. 68, 77.

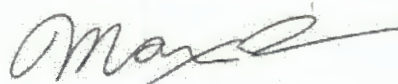
Were any of these portions to be disclosed, Defendants would be competitively harmed. *Playtex Prods.*, 2016 WL 1276450, at *11. Accordingly, for the reasons set forth in Plaintiff's Motion to Seal (ECF No. 68), Plaintiff respectfully request that the Court allow these portions to be filed under seal pursuant to Fed. R. Civ. P. 26(c)(1)(G).

Pursuant to Rule IX.A of Your Honor's Individual Practices, I have (i) publicly filed this motion; (ii) publicly filed the aforementioned memorandum with the proposed redactions; and (iii) filed the aforementioned memorandum under seal with the proposed redactions highlighted.

Granted.

Respectfully submitted,

So Ordered

10/10/24



Max S. Roberts

cc: All Counsel of Record (via ECF)